

Baker & Hostetler LLP

45 Rockefeller Plaza
New York, NY 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
David J. Sheehan
Marc E. Hirschfield
Nicholas J. Cremona

*Attorney for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

NINE THIRTY LL INVESTMENTS, LLC, a
Delaware limited liability company, NINE
THIRTY CAPITAL PARTNERS, LLC, a
Delaware limited liability company, LEVY
FAMILY PARTNERS LLC, a Delaware limited
liability company, NINE THIRTY PARTNERS
HOLDINGS, LLC, a Delaware limited liability
company, and STUART J. RABIN,

Defendants.

Adv. Pro. No. 10-04443 (SMB)

STIPULATION FOR EXTENSION OF TIME TO RESPOND

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the date before which defendant Levy Family Partners LLC (“Defendant”) may move, answer or otherwise respond to the Complaint is extended up to and including July 18, 2014.

The purpose of this stipulated extension is to provide additional time for Defendant to answer, move against, or otherwise respond to the Complaint. Nothing in this stipulation is a waiver of the Defendant’s right to request from the Court a further extension of time to answer, move or otherwise respond and/or the Trustee’s right to object to any such request.

Except as expressly set forth herein, the parties to this stipulation reserve all rights and defenses they may have, and entry into this stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this stipulation shall be deemed an original. This stipulation is entered into pursuant to the Order Granting Supplemental Authority to Stipulate to Extensions of Time to Respond and Adjourn Pre-Trial Conferences (ECF No. 5600) in the above-captioned case (No. 08-01789 (SMB)).

Dated: April 3, 2014

Of Counsel:

BAKER & HOSTETLER LLP

11601 Wilshire Boulevard, Suite 1400
Los Angeles, California 90025-0509
Telephone: 310.820.8800
Facsimile: 310.820.8859
Michael R. Matthias
Email: mmatthias@bakerlaw.com

BAKER & HOSTETLER LLP

By: s/ Nicholas J. Cremona

45 Rockefeller Plaza
New York, New York 10111
Telephone: 212.589.4200
Facsimile: 212.589.4201
David J. Sheehan
Email: dsheehan@bakerlaw.com
Marc E. Hirschfield
Email: mhirschfield@bakerlaw.com
Nicholas J. Cremona
Email: ncremona@bakerlaw.com

*Attorneys for Plaintiff Irving H. Picard, Trustee
for the Liquidation of Bernard L. Madoff
Investment Securities LLC*

Of Counsel:

SPERLING & SLATER

55 W. Monroe Street, Suite 3200
Chicago, Illinois 60603
Telephone: 312.641.3200
Facsimile: 312.641.6492
Michael G. Dickler
Email: mdickler@sperling-law.com

WOLFF & SAMSON PC

By: s/ Ronald L. Israel

140 Broadway, 46th Floor
New York, New York 10005
Telephone: 973.530.2045
Facsimile: 973.530.2245
Ronald L. Israel
Email: risrael@wolffsamson.com
Karen L. Gilman
Email: kgilman@wolffsamson.com

*Attorneys for Defendant Levy Family Partners
LLC*